### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON CORPORATION, ROBERT I. ADLER, JOHN DOES 1 THROUGH 5, and JANE DOES 1 THROUGH 5,

Defendants.

# DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S ASSENTED-TO MOTION FOR LEAVE TO FILE RESPONSE TO PLAINTIFF SHAREHOLDER.COM'S OPPOSITION TO DEFENDANT ADLER'S MOTION FOR PROTECTIVE ORDER

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation (collectively, "CCBN") submit this Assented-To Motion for Leave to File Response to Plaintiff

Shareholder.com's ("Shareholder's") Opposition to Defendant Adler's Motion for Protective

Order (the "Opposition"). In support of the motion, CCBN states as follows:

- The Opposition contains allegations directed at CCBN concerning the disposition of computers used by defendant Adler. CCBN seeks leave to file a short reply (submitted herewith) to address those allegations.
- 2. Counsel for both plaintiff Shareholder and defendant Adler assent to the relief requested in this motion.

Accordingly, CCBN respectfully requests that this Court grant their Assented-To Motion for Leave to File Response to Plaintiff Shareholder.com's Opposition to Defendant Adler's Motion for Protective Order.

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON CORPORATION,

By their attorneys,

/s/ David M. Moss

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DATED: June 15, 2005

#### **LOCAL RULE 7.1A(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), counsel for CCBN conferred on June 14, 2005 with counsel for plaintiff and for Mr. Adler, and all counsel assented to the relief requested in this Motion.

/s/ David M. Moss

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Defendants.

#### [PROPOSED] ORDER

Having considered Defendants CCBN.com, Inc.'s and The Thomson Corporation's Assented-To Motion for Leave to File Response to Plaintiff Shareholder.com's Opposition to Defendant Robert Adler's Motion for Protective Order, the Court finds the motion well-taken and it is hereby GRANTED.

United States District Judge	
Dated:	_, 2005